UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE GOOGLE ADVERTISING ANTITRUST LITIGATION

Case No. 1:21-md-03010 (PKC)

NOTICE OF PLAINTIFFS' MOTION TO AMEND

This Document Relates To:

ASSOCIATED NEWSPAPERS LTD. and MAIL MEDIA, INC.

Plaintiffs,

Case No. 1:21-cv-03446 (PKC)

-against-

GOOGLE LLC and ALPHABET INC.,

Defendants.

PLEASE TAKE NOTICE that, upon the memorandum of law accompanying this Notice of Motion, which attaches Plaintiffs' Proposed First Amended Complaint, Plaintiffs Associated Newspapers Ltd. and Mail Media, Inc. move this Court, before the Honorable P. Kevin Castel, Senior United States District Judge, on a date and at a time to be set by the Court, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 1000, for an order, pursuant to Federal Rule of Civil Procedure 15(a), granting leave to amend Plaintiffs' Complaint for Damages and Injunctive Relief. The basis for the motion is set forth in the accompanying memorandum of law, which attaches the Proposed First Amended Complaint.

Dated: October 5, 2021

Respectfully submitted,

Jeffrey A. Lamken Caleb Hayes-Deats

MOLOLAMKEN LLP

600 New Hampshire Avenue NW

Washington, DC 20037 Tel: (202) 556-2000 Fax: (202) 556-2001

Email: jlamken@mololamken.com

chayes-

deats@mololamken.com

/s/ John Thorne

John Thorne Daniel G. Bird Bethan R. Jones

Christopher C. Goodnow (pro hac vice forthcoming)

Mark P. Hirschboeck Eliana Margo Pfeffer

Eric J. Maier

KELLOGG, HANSEN, TODD, FIGEL

& FREDERICK, P.L.L.C.

1615 M Street NW

Suite 400

Washington, DC 20036 Tel.: (202) 326-7900 Fax: (202) 326-7999

Email: jthorne@kellogghansen.com

dbird@kellogghansen.com bjones@kellogghansen.com cgoodnow@kellogghansen.com mhirschboeck@kellogghansen.com epfeffer@kellogghansen.com emaier@kellogghansen.com

Counsel for Plaintiffs Associated Newspapers Ltd. and Mail Media, Inc.